IUCN SSC PSG SGA/SSA[1] ARRC Task Force

ARRC Task Force's comments on the chimpanzee surveys for the Baomahun Gold Mine in Sierra Leone

October 29th, 2025

We received from the consultants for FG Gold Limited on the 26th of September 2025 and the 13th of October 2025 the following document, respectively:

- *ARRC Letter September 2025*: for information, as to what has been done to date and proposed outline of next steps

- *LKS Methodology DRAFT_04: Local Knowledge Survey:* new proposed methodology to secure information on chimpanzees across wider landscape within the area of influence of the mine project

The ARRC Task Force panel for this project has emitted the following recommendations and feedback on this report:

General comments

- There has not been a clear articulation of the project's area of influence (AoI) which includes the extent of both the project's direct and indirect impacts, accounting for the mine itself and all associated infrastructures, including the access road and proposed tailings storage facilities. It is critical that the AoI be clearly defined and justified. Inappropriate definition of the AoI led to initial surveys being limited to the boundaries of the Kangari Hills' reserve while the critically endangered chimpanzee also ranges outside the borders of the reserve.

Understood. We have attached an AoI based on the most recent project designs. The AoI incorporates the entire Kangari Hills Forest Reserve (KHFR), plus a 10km buffer on planned infrastructure and associated facilities, including the access road to the existing road at Monghere. This includes areas of habitat that are potentially connected to the KHFR and areas in the vicinity of the proposed mine. The survey includes 28 villages that are within or close to the AoI.

- The proposed additional interviews should also include villages to the north and close to the

centre of the Kangari Hills, as these areas have confirmed presence of chimpanzees within the reserve boundaries and it is thus important to understand their presence, distribution, abundance and population structure (how many communities/groups and their respective size) outside the reserve boundaries, as well as inside. Groups are likely to be ranging in and outside the reserve and the project could effectively impact the entire chimpanzee population in this wider landscape.

The principal aim of the LKS is to provide additional data beyond the KHFR as we have significant transect and camera trap data for the KHFR. We also have access to social baseline data. We therefore propose continuing with the proposed villages. We have included a known artisanal mining settlement within the KHFR that is close to the project site.

- Indirect impacts of the project include the influx of people into the area seeking employment and/or business opportunities. Such in-migration is likely to exacerbate uptake of artisanal mining (ASM) activities within the Kangari Hills and in surrounding areas, an indirect impact of the project's presence in the locality. It is critical for the project to secure a baseline for the number of people currently involved in ASM activities, their profile, i.e. whether they are resident or come from elsewhere.

We understand the importance of considering artisanal mining and the potential for this activity to increase. Significant information about this activity has been collected by FG Gold over the past few years, culminating in the development of an artisanal mining management plan. We will refer to this and engage with FG Gold's social team when developing the primate management plan.

- The project also needs baseline data on current threats to chimpanzees, including their interactions with local communities (e.g. crop foraging, quality of encounters, perceptions & behaviour of people towards chimpanzees when they see them and vice versa).

We have some baseline data already, such as observations during transect surveys and the camera trapping. We have also had discussions with local park rangers; we will use the social baseline data collected so far; and we will conduct a literature review. We will also adjust the LKS methodology to collect additional information regarding threats to chimpanzees.

- The respective aims of the focus groups and the individual interviews need to be clarified and explicitly articulated. All social survey needs to be preceded with a clear statement concerning prior informed consent for participation and confirmation of anonymity following best practices.

We will add some clarity to the aims. We will also add clarity regarding the participation so that surveyors know to collect consent before the FGDs and interviews.

- The panel also wish to inform the consultants that in alignment with IFC PS6, all chimpanzee habitat is to be considered critical habitat and that the 2022 critical habitat assessment mentioned in '*ARRC Letter September 2025*' is incorrect and requires revision after further surveys.

This is understood and we have communicated this previously to FG Gold. We will classify chimpanzees as critical habitat features and updates to the initial CHA are planned as part of the reporting process. The CHA will incorporate management measures recommended in the primate management plan, which will treat chimpanzees as critical habitat features. It also seems very likely from data collected so far that at least one other primate species (e.g., diana monkey) will also be classed as critical habitat.

- Please note that the additional local knowledge surveys likely will require further detailed surveys of chimpanzees in the AoI of the project, i.e. localities outside the Kangari Hills' Reserve to ensure that more robust baseline is obtained for the purpose of the impact assessment, appropriate application of the mitigation hierarchy, i.e. avoidance, reduction, restoration and compensation, with an estimation of residual impacts on chimpanzees based on numbers rather than habitat metrics.

The proposed LKS methodology expands the previous and current survey effort beyond the Kangari Hills Forest Reserve. Given the low density of chimpanzees observed within the higher quality habitat of the forest reserve, and very limited academic or anecdotal evidence or their presence outside of the reserve (including other baseline survey data collected as part of the ESIA development), we concluded that local knowledge surveys were more likely to be successful in identifying chimpanzee presence and habitat than additional transect surveys or camera trapping. Based on our experience so far, an estimate of population size is likely to be difficult and have a wide confidence interval.

Once we have completed the planned surveys, and data from LKS and camera trapping has been analysed we will provide recommendations to FG Gold to follow the mitigation hierarchy. This may include additional surveys if significant data gaps are apparent or they would substantially improve mitigation. A monitoring plan will be developed for FG gold to look at effectiveness of mitigation and longer-term trends.

- Finally, the project also needs to carefully consider cumulative impacts within the landscape that are likely to further enhance threats and project impacts on chimpanzees.

We will consider potential cumulative impacts in the primate management plan. A project-wide Cumulative Impact Assessment has not been completed. Whether one will be is undetermined.

Specific comments

- The people running the social surveys should verify first and foremost whether FG participants and interviewees know what a chimpanzee is (avoiding confusion with baboons) and if they have seen them personally themselves. People should be asked open questions as to the physical characteristics (people should for example mention they do not have a tail without being prompted) and their behaviour, e.g. where they sleep, how they vocalise. This is important to establish prior to proceeding with further questions. The social team should also consequently be accompanied by a primate expert with good knowledge of the primates in the locality.

Understood. We will add a section in the instructions and ensure that the necessary training has been delivered (e.g., a pre-survey video call with the surveyors). We have also asked FG Gold to engage Leonefields' (local consultancy) ecologists that have been working on the camera trapping and transect surveys. FG Gold are receptive to this. Also, Leonefields are not aware of baboon sightings in the area, and we have yet to find evidence of them; they are not appearing so far on the camera traps either. However, we have included instructions to ensure that the chances of a mix-up are reduced.

- The focus groups should provide a broader outlook on chimpanzee presence location (need precise location, such as cardinal directions or name of site, and distance from village) both current and historical, as well as seasonal patterns of occurrence in different localities, and general perceptions of

threats to chimpanzees locally, typical encounter rates and habitats where chimpanzees have been observed or signs thereof such as nests. FG questions can also ask about whether people have ever seen a captive chimpanzee in the locality, where, and when and what happened to that chimpanzee and also whether anyone has ever come across a dead chimpanzee, where, when and what was the presumed cause of death. Consider strongly adding a question about whether chimpanzees cross any roads, if so ask about frequency, which season, how many individuals etc. Understanding if chimpanzees are crossing roads is important particularly given the company's road improvement and road creation plans and to formulate mitigation measures.

We will adjust the FGD instructions to include questions pertaining to the above.

- The individual interviews should focus more on questions pertaining to interactions between people and chimpanzees in the village or neighbouring villages, as well as perceived threats to chimpanzees to triangulate information gathered during the FGs- one should never ask directly whether a person hunts or consumes chimpanzees or other primates; people are unlikely to respond truthfully, especially in an area that is Muslim dominated. Best ask whether they know whether chimpanzees have been killed or captured in locally and if they say yes, you may ask in which locality and why and when that was. One may also ask about how people generally respond when they see chimpanzees and how chimpanzees respond to seeing people. They can also provide insights into the crops that are potentially consumed by chimpanzees, where and when and roughly how often; whether it is their own or that of people they know.

Our principal aim for the interviews is to gather quantitative information regarding the presence, frequency of occurrence, behaviours, and threats in certain areas. We will include some questions in the interviews around threats and interactions, including crop-raiding and hunting (adjusted as per above).

- There should be clear criteria for partaking in the focus groups so that experienced and knowledgeable individuals partake, e.g. hunters, farmers who are relatively long-term residents to the area. Interviewees should also have lived a minimum of years in the locality; there is no point interviewing people who are recent residents.

Agreed. We will make this clearer in the instructions.

- The photos used are not ideal and there are also some errors, e.g. the last photo of the sooty mangabey is actually that of a white-collared mangabey; there is also a misleading photo for the olive colobus. The panel therefore recommends careful review of the photos used and to only use a single photo or at most two -one of the face and the other of full body- alongside maybe an illustration from guide to West African primates. The set should also include one or two primate species that are not known to not occur in the area, as controls.

Noted. We will review the photos and engage our ecologists on-the-ground.

- It appears that the camera trapping to date has not yielded many images of chimpanzees; the deployment could therefore be adjusted to a design that aims to maximise the images of chimpanzees for the purpose of individual identification and a capture-recapture analysis. However, additional time would be required for such an analysis and reporting.

The camera trapping has indeed yielded limited data that are currently insufficient to provide an accurate population density estimate. We still have camera traps out and data to review.

The methodology used so far was selected as we had very limited information regarding chimpanzees in the forest and so a randomised grid design was selected. With a higher population density, the methodology could be used to estimate population density. Capture-recapture analysis would likely face similar difficulties.

Once surveys are completed, we can review the next steps and determine the most effective approach.

- Further field surveys will need to ensure at least one member of the survey team knows how to recognise chimpanzee nests in oil palm trees, as nests outside forests are likely to be found in oil palm trees.

Noted. We will include this as a recommendation should further surveys be required. We will also have an ecologist as part of each survey team for the local knowledge surveys.

- Although the map showing chimpanzee evidence is difficult to read, there does appear to be larger forest patches to the west and south of the mine site. This area should also be surveyed, regardless of feedback from community members on chimpanzee presence.

To date, we've had no indication of chimpanzees being present in this area and much of the forest is highly disturbed. This area will be covered by the LKS and we can determine an appropriate approach once we have reviewed all the survey data. If we find clear evidence of presence, then additional camera trapping (including recce surveys) would be considered.

We look forward to receiving your response as to how you plan to address the above comments and feedback. We also look forward to seeing the revised interviews before they are being rolled out with a more complete map outlining the project's AoI and all the villages to be targeted.

Should you have any queries, please do not hesitate to contact us.

Best regards,

The ARRC Task Force panel for this project